Atlanta Gas Light Company
Atlanta Gas Light Company`s Experimental Tariff, Georgia Sustainable Environmental and Economic Development Pilot Program
Docket 28871
Responses to Staff's 3rd Set of Data Requests

STF-3-1 Related to the 2015 Georgia Sustainable Environmental or Economic Development ("SEED") contract approved in 2015, please answer the following:

a. Please provide a narrative of the natural gas facilities that Atlanta Gas Light Company ("AGL" or "Company") constructed for the benefit of Rayonier Performance Fibers, LLC ("RPF"). As part of the discussion, provide the size and length of facilities, actual costs, and when construction was completed.

b. Per the Company's SEED tariff in section 2.1, was RPF approved as Class 1, 2, or 3?

c. Under the proposed new contract, will RPF remain in the Class approved in 2015?

d. How does Rayonier's current number of employees compare to the number of employees when the contract was initiated?

e. How much future job growth does Rayonier anticipate? When is this growth expected to take place?

RESPONSE

A. In 2015, AGL began a project to serve the customer that entailed an improvement of the Doctortown tap station and installation of 6,849 feet of 8" steel pipe (MAOP 300 psi) originating at the Doctortown tap station and traversing west along Doctortown Road and north along AGL right-of-way to RPF's location. The project was completed in June 2016 at a cost of approximately $3.2 million. Please see attachment Exhibit B.

B. Per the contract the Commission approved on June 22, 2015 in Docket No. 28871, the customer was approved as SEED Class 2 service.

C. Yes, under the proposed contract extension, the customer would continue to receive service in SEED Class 2. This request is for an extension of the existing SEED contract between the customer and AGL; this is not a new contract. Except for a new contract duration and subsequent contract renewal provisions, no contract terms have changed.

D. The customer employed 807 people in 2015 and employs 819 as of 2024

E. The customer expects to add 30 to 40 additional jobs over the next five years.

Respondent: William Horne
Director, Resource Planning & Economic Development
Southern Company Gas

STF-3-2 Please provide the current gas load, (hourly, daily, monthly, and annually) used by RPF.

RESPONSE

[redacted]

Respondent: William Horne
Director, Resource Planning & Economic Development
Southern Company Gasp

STF-3-3 Who is the current certified gas marketer that serves RPF?

RESPONSE

The customer does not require a certificated marketer since the customer is interruptible. RPF's pooler is Texican.

Respondent: William Horne
Director, Resource Planning & Economic Development
Southern Company Gas

STF-3-4 Regarding July 2, 2025, petition to request an extension of the AGL and RPF SEED contract, please provide the following:

Exhibit-A: AGL SEED Tariff: The currently approved tariff.

Exhibit-B: RPF SEED Project Maps: Location of RPF and the location of the delivery point.

Exhibit-C: Cost to Serve: As an electronic Excel file using the DOT Rider cost to serve and recovery model format, please provide the cost to serve a recovery of RPF related Plant from June 2015 to June 2025 historic and from July 2025 to December 2030 projected to include:

a. Plant in Service
b. Accumulated Depreciation
c. Book Depreciation
d. O&M
e. ROE Return Required
f. Total Cost to Serve
g. Total Operating Revenues as provided in the contract.

Note: The goal of the Cost to Serve Analysis is to determine AGL's projected costs and how the contract revenues will recover those costs and return requirements.

Exhibit-D: Updated RPF and Southern Natural Gas ("SNG") Precedent Agreement?

RESPONSE

Commission Staff has the requested Exhibit A information. AGL's tariff is publicly available on the Atlanta Gas Light Company website at www.atlantagaslight.com(more specifically, please see: https://www.atlantagaslight.com/content/dam/southern-co-gas/agl/docs/agl-tariff.pdf). Moreover, all AGL tariff revisions are filed with the Commission in Docket No. 42315.

Please see attachment Exhibit B. The magenta line on the map is the Magnolia pipeline. The light blue line on the map is the approximate location of the facilities installed to serve RPF detailed in the response to STF-3-1a.

Attachment C does not exist, and the requested format (the DOT Rider model) is not well suited to present the requested information. AGL will provide a supplement to this response to provide information regarding the cost to serve analysis.

With reference to the requested Exhibit D, AGL does not have copies of the precedent agreement between the customer and SNG, since AGL is not a party to the agreement. AGL provided the only copy of the agreement that it received when the initial agreement was filed and approved by the Commission in 2015. The contract between the interstate pipeline and the customer as a shipper on that system is an interstate transaction that is likely within the jurisdiction of the Federal Energy Regulatory Commission (FERC).

Respondent: William Horne
Director, Resource Planning & Economic Development
Southern Company Gas

STF 3-5 On page 2 of the AGL public disclosure petition, the Company stated that RPF will continue its materially expanded use of natural gas. Please explain what are RPF's plans over the next five (5) years to expand the use of natural gas.

RESPONSE

[redacted]

Respondent: William Horne
Director, Resource Planning & Economic Development
Southern Company Gas

STF 3-6 On page 3 of the AGL public disclosure petition, the company stated that RPF will increase the significant environmental and economic development benefits that RPF provides to Georgia. Please explain how RPF will increase environmental and economic development benefits in Georgia over the next five (5) years.

RESPONSE

The customer plans to embark on a green energy project that is expected to result in over $1 billion in investment.

Respondent: William Horne
Director, Resource Planning & Economic Development
Southern Company Gas

STF 3-7 On page 5 of the public disclosure petition, AGL stated the following:

The natural gas service provided to RPF under the SEED Rate Schedule will allow RPF to continue to create new jobs or avoid potential job reductions in Georgia and provide material benefits in the areas of economic development or infrastructure enhancements, which might not be attained absent service under the SEED Rate Schedule as required under Section 3.3.

Please answer the following:

a. If RPF is not approved to continue the SEED contract, will it be placed in a Firm rate Class? If so, what Firm rate class will it be placed in?

b. Under the current SEED rate, does this operate the same as Firm service? If not, please explain.

c. If RPF is not approved to continue the SEED contract, what communication has RPF provided to AGL that RPF will reduce jobs?

d. If RPF is not approved to continue the SEED contract, how will its natural gas service change that will be materially different than it is today under SEED.

RESPONSE

A. The customer has requested an extension of its current contract. The customer has not requested a switch to firm service.

B. The service provided to this customer is designated as interruptible. Nonetheless, the customer has rights to 12,500 Dth/day of interstate capacity to the designated SNG delivery point on AGL's system, and currently there are no restrictions on AGL's system between the customer and the SNG point of delivery that would prevent AGL from redelivering any gas received on behalf of the customer to the customer's location. Consequently, unless there are unforeseen circumstances, if the customer nominates and SNG confirms delivery of up to 12,500 Dth/day, AGL expects that it will be able to redeliver the nominated and confirmed volumes to the customer.

C. The customer has not communicated to AGL what the impact would be if the SEED contract extension is not approved.

D. The customer has requested an extension of the existing contract. The customer has not indicated what, if any, alternative service it may request if the contract extension is not approved by the Commission.

Respondent: William Horne
Director, Resource Planning & Economic Development
Southern Company Gas